

HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

MAYTRONICS, LTD.,

Plaintiff,

v.

CHASING INNOVATION TECHNOLOGY  
CO., LTD. and CHASING TECHNOLOGY  
(USA), LLC,

Defendants.

Case No. 2:23-cv-01406-JNW

STIPULATED MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO COMPLAINT

NOTE ON MOTIONS CALENDAR:  
February 13, 2024

Plaintiff, Maytronics, Ltd. ("Plaintiff") and Defendants Chasing Innovation Technology Co., Ltd. and Chasing Technology (USA), LLC ("Defendants") file this Stipulated Motion for Extension of Time to Respond to Complaint.

Plaintiff Maytronics, Ltd. ("Plaintiff") filed its Complaint on September 11, 2023 (Dkt. #1) against the Defendants. A stipulation for extension of time and waiver of service was filed on November 15, 2023 (Dkt. #10), consolidating and setting the due date for Defendants to answer, respond, or otherwise defend against the complaint in the above referenced action to January 16, 2024. Defendants filed an Unopposed Motion for Extension of Time to Respond to Complaint on January 16, 2024 (Dkt. #22) seeking an extension to respond to the complaint fourteen days to January 30, 2024. On January 30, 2024 the parties filed a Stipulated Motion for Extension of Time to Respond to Complaint by fourteen days (Dkt. #23), which was granted

1 moving the deadline to respond to February 13, 2024 (Dkt. #24). Defendants herein request a  
2 further extension to respond to the Complaint of fourteen days, up to and including February 27,  
3 2024, and Plaintiff does not oppose this request. There is good cause as this extension is not  
4 being sought for purposes of delay, but to allow the parties to continue to participate in ongoing  
5 settlement discussions.

6 Counsel for Defendant conferred with counsel for Plaintiff, and counsel for Plaintiff  
7 stipulates to this this extension.

8 Accordingly, the parties submit this stipulated request for an order extending the deadline  
9 for Defendants to answer, respond, or otherwise defend against the complaint to February 27,  
10 2024.

11 DATED this 13th day of February 2024.

12 K&L GATES LLP

STOKES LAWRENCE, P.S.

13 By /s/Shelby R. Stoner

By /s/John T. Fetters

14 Christopher M. Wyant, WSBA #35561

John T. Fetters (WSBA #40800)

15 Shelby R. Stoner, WSBA # 52837

Valerie Walker (WSBA #52584)

16 925 Fourth Avenue, Suite 2900

1420 Fifth Avenue, Suite 3000

Seattle, WA 98104

Seattle, WA 98101-2393

17 Phone: (206) 623-7580

Telephone: 206-626-6000

E-mail: chris.wyant@klgates.com

E-mail: John.fetters@stokeslaw.com

E-mail: shelby.stoner@klgates.com

E-mail: Valerie.walker@stokeslaw.com

18 *Attorneys for Plaintiff Maytronics, Ltd.*

Donald R. McPhail (pro hac vice)

Eric W. Schweibenz (pro hac vice)

Alexander B. Englehart (pro hac vice)

OBLON, MCLELLAND, MAIER &

NEUSTADT LLP

1940 Duke Street

Alexandria, VA 22314

Telephone: 703-413-3000

E-mail: dmcphail@oblon.com

E-mail: eschweibenz@oblon.com

E-mail: aenglehart@oblon.com

*Attorneys for Defendants Chasing Innovation*

*Technology Co., Ltd. and Chasing*

*Technology (USA), LLC*